

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

SUBJECT: State Concurrence Request Letter for RA Signature for the

[FORMTEXT

Blades Groundwater Site, Blades, Delaware

FROM: Paul Leonard, Acting Director (3SD00)

Superfund & Emergency Management Division

TO: Cosmo Servidio, Regional Administrator (RA00)

Office of Regional Administrator

Attached is the State Concurrence Request Letter for the Blades Groundwater site (Site). The Site has been identified to have electroplating compounds, per-and polyfluoroalkyl substances (PFAS), and other hazardous compounds contamination in public and residential drinking water wells at concentrations above the State's MCL and EPA's Health Advisory Levels (HAL). EPA is seeking the concurrence of the State of Delaware to add the Site to the National Priorities List (NPL). A signed Governors concurrence letter is requested by July 29th, 2019 in order to add the Site to the September 2019 proposed NPL update. This concurrence request letter is provided for your review and signature.

BACKGROUND AND HISTORY

- EPA has been working with the Delaware Department of Natural Resources and Environmental Control (DNREC), since 1995 to investigate the impact of groundwater, surface water and sediment contamination in the area of Blades. Delaware.
- In 1995 and 2010, the DNREC conducted Preliminary Assessments (PAs) on two electroplating facilities due to concerns over health and contamination in public and residential drinking water wells.
- In 1994 and 1995 documented violations for improper handling of hazardous wastes were recorded by DNREC and EPA inspectors at Peninsula Plating facility. At DNREC's request, EPA completed a Removal Action at the Peninsula Plating facility in 1995. A Site Inspection (SI) was completed in 1999 to address any additional Site contamination and it was determined that the Site posed a low-level continued threat to the environment.
- The Procino Plating facility received three violations from DNREC and USEPA for improper handling of hazardous wastes in 1994, 1998, and 2002. Procino Plating also continued to have unsatisfactory inspections of the facility in 2007 and 2008. DNREC requested support from EPA in 2008 to take an emergency action and conduct a Removal Evaluation. In 2009 EPA conducted a criminal investigation at the Procino Plating facility causing the facility to temporarily cease operations. Under cooperative agreement with DNREC, EPA completed a
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PA in 2010 and an SI in 2011. Procino Plating entered the voluntary cleanup program in 2011 and completed a site remedial investigation between 2011 and 2015.

- EPA collected samples during an EPA lead Site Inspections in 2017 and 2018 and found electroplating compounds, PFAS, and other hazardous substances. Three public drinking water wells owned by the Town of Blades were found to have concentrations up to 187 parts per trillion (ppt) for PFAS. Concentrations detected in the two suspected source areas have been as high as 2,820 ppt in groundwater, (Federal HAL 70 ppt, Delaware PFAS is listed as a hazardous substance and has an RSL 70 ppt).
- The Site consists of several comingled groundwater plumes containing electroplating compounds, per-and polyfluoroalkyl substances (PFAS), and chromium that have impacted three municipal and eight residential drinking water wells in and near the Town of Blades. Two electroplating facilities have been identified in the area that are potential sources for this contamination, Peninsula Plating and Procino Plating.

KEY ISSUES

- Two sources of contamination have been identified to be emanating from two electroplating facilities known as Procino Plating and the Former Peninsula Plating facilities. These facilities have been identified to have high concentrations of PFAS, metals, and other electroplating contamination emanating from the sites from historical operations.
- DNREC has asked EPA for technical and financial assistance to investigate and cleanup the source areas and drinking water wells.
- All three public drinking water wells are impacted with PFAS above the HAL. The wells are
 operated by the Town of Blades and are the sole source supply of drinking water to the local
 community. The water is being treated and currently meets Delaware water quality
 standards.

REGULATORY SUMMARY

• The Site is being considered for proposal for the National Priorities List for the September 2019 update.

STAKEHOLDER INVOLVEMENT

- The State of Delaware DNREC has asked for EPA's assistance with the site due to the high concentrations of PFAS and the complex geology at the site. DNREC has verbally expressed acceptance and concurs with the site's proposal to the NPL.
- The Town of Blades owns and operates three pubic drinking water wells which supply water to the community. The water company is amenable to EPA involvement and actions.

COMMUNICATIONS PLAN

• The Site is scheduled to be proposed in September 2019. Briefings and meetings with state and local officials will be scheduled in the coming months.

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• DNREC will most likely want to hold a meeting with local officials this Summer to discuss the potential listing and may request RA attendance.

NEXT STEPS

- All sampling activities have concluded, no additional assessment is required to assess the groundwater aquifer for NPL listing purposes.
- EPA has completed preparation of an HRS package listing. The NPL proposal date is scheduled for September 2019.
- Plan to get a concurrence letter from the Governor by the end of July 2019 to keep the Blades Site on track for a September 2019 NPL proposal.
- EPA plans to reach out to the State and local officials prior to the proposed listing.